

Pamela M. Egan, CA Bar No. 224758 (*pro hac vice* admission pending)  
Paul H. Beattie, WSBA No. 30277

**CKR Law LLP**

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*Attorneys for Mark D. Waldron, in his capacity  
as the duly-appointed Chapter 11 Trustee*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, INC., a Washington  
corporation,  
  
Debtor.

Case No. 18-03197 FPC 11

Chapter 11

**DECLARATION OF PAMELA M.  
EGAN IN SUPPORT OF MOTION  
TO ADMIT PRO HAC VICE**

I, Pamela M. Egan, being conscious of the penalties of perjury under Washington State and federal law, declare the following statements to be true and correct and based on my own personal knowledge and information.

I am a partner with CKR Law LLP. I provide the following information in support of the motion for my admission to practice before this Court *pro hac vice* until I am formally admitted to practice before the United States District Court for the Eastern District of Washington, which admission is imminent.

**A. Applicant's address and phone number.**

CKR Law LLP  
506 2nd Avenue, 14th Floor

1 Seattle, Washington 98104

2 T: (415) 297-0132

3 E: [pegan@ckrlaw.com](mailto:pegan@ckrlaw.com)

4 **B. Dates of admission to practice before other courts.**

5 1989: Admitted to Oregon Bar (voluntarily resigned Oregon Bar in  
6 2013)

7 2002: Admitted to California Bar;  
8 U.S. District Court for the Northern District of California;  
9 U.S. District Court for the Eastern District of California; and  
10 U.S. District Court for the Central District of California.

11 **C. The name, address, and phone number of admitted counsel with  
12 whom the applicant will be associated.**

13 Paul H. Beattie  
14 CKR Law LLP  
15 506 2nd Avenue, 14th Floor  
16 Seattle, Washington 98104  
17 T: (206) 696- 9095  
18 E: [pbeattie@ckrlaw.com](mailto:pbeattie@ckrlaw.com)

19 **D. The necessity for appearance by Applicant.**

20 The Chapter 11 Trustee has retained CKR Law LLP (“CKR”) to represent  
21 him in the above-captioned case. I am an experienced chapter 11 bankruptcy  
22 practitioner, having practiced bankruptcy and insolvency law for over two (2)  
23 decades, including over a decade at nationally-known bankruptcy boutique  
24 Pachsulski Stang Ziehl & Jones LLP.

25 In addition to my significant bankruptcy and Chapter 11 experience, CKR  
Law also has an extensive bankruptcy and restructuring department, with attorneys  
experienced in representing Chapter 11 debtors, creditors’ committees, secured and  
unsecured creditors, trustees, asset purchasers and sellers, and other parties in  
complex bankruptcy and insolvency proceedings in courts across the country.

1       Moreover, I speak fluent Russian and have experience working with Russians  
2 in the insolvency setting and elsewhere. As this case involves various Russian  
3 parties, my language skills and experience will provide a relevant and valuable  
4 benefit to the Chapter 11 Trustee.

5       This bankruptcy matter also involves cutting-edge blockchain technology.  
6 CKR is particularly well-suited to represent the Chapter 11 Trustee in this Chapter  
7 11 case, because CKR has one of the largest and most experienced blockchain  
8 practice groups in the United States. CKR's Blockchain Technology & Digital  
9 Currency practice group provides clients with sophisticated, value-added legal  
10 advice in legal matters involving bankruptcy, real estate, intellectual property,  
11 banking, finance, securities, corporate, crowdfunding, investment funds,  
12 employment, and litigation. Recently, my partner Alexandra Levin Kramer was  
13 named by ICO Alert (a blockchain trade group) as the only practicing attorney in  
14 the United States on their list of Top 40 Blockchain Influencers of 2018. CKR's  
15 knowledge and experience in blockchain and related issues will allow the Chapter  
16 11 Trustee to discharge his duties in this factually and legally-complex Chapter 11  
17 proceeding.

18               **E.       Disciplinary Sanctions by Any Court or Bar Association.**

19 In 1996, the Oregon State Bar reprimanded me for tricking an evasive witness into  
20 accepting a subpoena. In the more than twenty years since, I have had no other  
21 disciplinary issues, have earned an AV rating for ethics and skill from Martindale  
22 Hubble, and have become a member of the honor society, Fellows of the American  
23 Bar Foundation.

24       I understand that I am charged with knowing and complying with all Local

1 Bankruptcy Rules for the Eastern District of Washington and the Local Rules for  
2 the United States District Court for the Eastern District of Washington.

3 I hereby declare under penalties of perjury that the foregoing statements are  
4 true, accurate, and correct to the best of my knowledge, information, and belief.

5 Signed in King County, Washington.

6 February 11, 2019.



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